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FILED
DISTRICT COURT OF GUAM
JAN 30 2006
MARY L.M. MORAN
CLERK OF COURT

FILED
DISTRICT COURT OF GUAM
JAN 13 2006
MARY L.M. MORAN
CLERK OF COURT

Attorneys for Plaintiffs

IN THE DISTRICT COURT OF GUAM

ELSA M. SANTOS and GERARDO SANTOS

CIVIL CASE NO. CIV05-00031

Plaintiffs,

vs.

DISCOVERY PLAN

DONGBU INSURANCE COMPANY, LTD.,

Defendants.

On January 11, 2006, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the parties met, represented by their respective undersigned counsel, at the Law Office of Robert L. Keogh and discussed matters relevant to devising a Discovery Plan. The parties agreed to and hereby submit the following plan:

1. Discovery will generally be conducted in phases as follows: (a) liability; and (b) damages.

2. Depositions of fact witnesses will be taken as needed, prior to the discovery cut-off date.

3. Each of the parties intend to propound Interrogatories, Requests to Produce and Requests for Admissions to each other. This discovery shall be served in a manner as to be subject to answer or response on or before the discovery cut-off date.

4. If at this point, this matter is not yet settled by the

1 parties, depositions of medical witnesses and other experts
2 respectively identified by the parties will be taken.

3 5. Discovery is to be completed by the discovery cut-off
4 date established in the Scheduling Order in this matter.

5 6. The parties have previously exchanged or will soon
6 exchange initial discovery as demonstrated by the separate
7 disclosure statements filed by the parties. Compliance with
8 mandatory disclosure as set forth in Rule 26(a)(1) is on-going.

9
10 Respectfully submitted.

11 **LAW OFFICE OF ROBERT L. KEOGH**
12 Attorneys for Plaintiff

13
14 DATE: 1/13/06

By: 

ROBERT L. KEOGH

15
16 **BLAIR STERLING JOHNSON MOODY**
17 **MARTINEZ & LEON GUIERRERO**
18 Attorneys for Defendant

19 DATE: January 13, 2006

By: 

THOMAS C. STERLING

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24 **RECEIVED**

25 JAN 13 2006

26 DISTRICT COURT OF GUAM
27 HAGATNA, GUAM